

March 26, 2021

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act and Section 35.13 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Regulations under the Federal Power Act (18 C.F.R. § 35.13), Southern California Edison Company ("SCE") submits a proposed change to SCE's Post Retirement Benefits Other than Pensions ("PBOPs") stated amount of the Authorized PBOPs Expense Amount, to be included for recovery in SCE's formula transmission rate ("Formula Rate"), as set forth in Appendix IX of SCE's Transmission Owner Tariff, FERC Electric Tariff, Third Revised Volume No. 6 ("TO Tariff").<sup>1</sup> SCE's proposed change to the Authorized PBOPs Expense Amount is submitted under the "single-issue" filing provisions of SCE's Formula Rate Protocols, which state that "the sole issues that can or shall be addressed are whether the changes proposed by SCE are consistent with these Protocols and are just and reasonable."<sup>2</sup> Accordingly, no other issues should be at issue in this limited single-issue filing.

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<sup>1</sup> Attachment 1 to Appendix IX is the Formula Rate Protocols, and Attachment 2 to Appendix IX is the Formula Rate Spreadsheet.

<sup>2</sup> Section 8 of the Formula Rate Protocols.

In this filing, SCE is only seeking to revise its Formula Rate to reflect the revision to the Authorized PBOPs Expense Amount from the currently effective amount of \$6,329,000 to \$0 to become effective January 1, 2021. This filing is required pursuant to the Formula Protocols. SCE is not proposing to revise the currently-effective Retail or Wholesale Base Transmission Revenue Requirement (“TRR”), or any associated rates. However, if the Commission accepts SCE’s proposed revision to the Authorized PBOPs Expense Amount, SCE’s 2022 retail Base TRR is expected to be reduced by about \$0.380 million, as compared to if there were no revision, as explained below in Section II.

The documents submitted with this filing consist of this letter of transmittal and all attachments hereto, and the revisions to the TO Tariff in both clean and redline format.

## **I. BACKGROUND**

On April 11, 2019, in Docket No. ER19-1553-000, SCE filed to amend the TO2018 Formula Rate (“TO2019A Formula Rate”) proposing tariff changes necessary to reflect dramatic regulatory and financial conditions that have changed since the submission of the TO2018 Formula Rate. On June 11, 2019, the Commission accepted SCE’s TO2019A Formula Rate and related revised 2019 Base TRR, suspended it for a nominal period, to become effective November 12, 2019, subject to refund, and established hearing and settlement judge procedures. On September 27, 2019, SCE filed a partial offer of settlement in Docket No. ER19-1553 to reduce the requested ROE from 17.62% to 12.47%. On December 3, 2019, the Commission issued a Letter Order approving the partial settlement.<sup>3</sup> On July 1, as amended on July 2, 2020 to submit the new Stakeholder Review Process (SRP) tariff as a tariff record, SCE filed an Offer of Settlement in Docket

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<sup>3</sup> 169 FERC ¶ 61,176.

No. ER19-1553 to resolve all issues set for hearing. On September 23, 2020, the Commission issued a Letter Order approving the settlement.<sup>4</sup> The settlement implemented revisions to SCE's TO Tariff, including revisions to its Formula Rate Protocols and Formula Rate Spreadsheet.

SCE's Formula Rate Spreadsheet consists of 34 individual schedules that calculate different aspects of SCE's Base TRR and associated rates. PBOPs expenses are included in FERC Account 926 "Employee Pensions and Benefits," an Administrative and General "A&G" account, in accordance with the FERC Uniform System of Accounts. The Formula Rate provides for inclusion of a stated amount of PBOPs expenses, called the "Authorized PBOPs Expense Amount" through the A&G Expense component of the Base TRR.<sup>5</sup> Any difference between SCE's actual PBOPs expenses and the stated value of the Authorized PBOPs Expense Amount is excluded from recovery, as calculated on Schedule 20 of the Formula Spreadsheet. The Authorized PBOPs Expense Amount is currently \$6,329,000, as filed in Docket No. ER20-1382. In accordance with Commission policy, the Authorized PBOPs Expense Amount can only be revised pursuant to Commission approval of a Section 205 filing requesting a new amount.<sup>6</sup>

SCE is required pursuant to the currently-effective Formula Rate Protocols to make a single-issue Section 205 filing to revise its stated Authorized PBOPs

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<sup>4</sup> 172 FERC ¶ 61,270.

<sup>5</sup> SCE's Formula Rate allocates only a portion of total A&G expenses to the Commission-jurisdictional Base TRR, primarily based on the Labor Allocation Factor, currently about 6%. Most A&G expenses, including PBOPs expenses, are recovered through the California Public Utility Commission ("CPUC") jurisdictional rates.

<sup>6</sup> See Commission's Statement of Policy on PBOPs issued December 17, 1992 in AI93-4. 61 FERC ¶ 61,330 (1992); *order on reh'g*, 65 FERC ¶ 61,035 (1993). The Commission reiterated the policy in *Vermont Yankee Nuclear Power Corp.*, 120 FERC ¶ 61,043 at P8, stating that "[t]he Commission requires companies to file changes in their PBOP expense prior to passing through jurisdictional wholesale rates."

Expense Amount every year, beginning in 2019.<sup>7</sup> The condition is stated in Section 8b of the currently-effective Formula Rate Protocols:

“With respect to Post-Retirement Benefits Other than Pensions (“PBOPs”), the Formula Rate identifies an Authorized PBOPs Expense Amount in Note 3 on Schedule 20 (Administrative and General Expenses), which is initially stated as \$40,171,333. Beginning in 2019, SCE shall make a single-issue Section 205 filing by April 1 of each year to revise the Authorized PBOPs Expense Amount, seeking an effective date of January 1 of the year of the filing.”

The requirement to submit a PBOPs filing each year by April 1 will allow SCE to incorporate the proposed Authorized PBOPs Expense Amount as a cost of service element in SCE’s Annual Update submitted by December 1 of the filing year. Specifically, assuming timely Commission acceptance of SCE’s filed Authorized PBOPs Expense Amount, SCE will include the new value in the TO2022 Annual Update,<sup>8</sup> to be filed by December 1, 2021.

## **II. PROPOSED REVISIONS TO SCE’S AUTHORIZED PBOPS EXPENSE AMOUNT**

SCE requests that the Commission approve an Authorized PBOPs Expense Amount of \$0 with an effective date of January 1, 2021. SCE’s proposed Authorized PBOPs Expense Amount is supported by SCE’s PBOPs Funding

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<sup>7</sup> The requirement under SCE’s revised Formula Rate Protocols to submit a filing seeking to revise the Authorized PBOPs Expense Amount each year beginning in 2019 is a revision from the mechanism in SCE’s Original Formula Rate (i.e., the formula rate that was in effect from January 1, 2012 through December 31, 2017 pursuant to Docket No. ER11-3697), which required filings every other year, if certain conditions were met. See Section 8b of SCE’s Original Formula Rate Protocols. This revision—to require annual filings—was initially established in SCE’s Formula Rate that was in effect from January 1, 2018 through November 11, 2019 pursuant to Docket No.18-169, and continues to be a requirement in SCE’s currently effective Formula Rate Protocols.

<sup>8</sup> The “TO2022 Annual Update” refers to SCE’s Transmission Owner 2022 Annual Update that will set SCE’s Base Transmission Revenue Requirement and associated rates for the 2022 year.

Memo (Attachment 1 to this filing) and SCE's 2020 Postretirement Health and Life Benefits report (Attachment 2 to this filing). The proposed \$0 value for 2020 is shown in the PBOPs Funding Memo (Attachment 1), on Line 10 "Net 2020 Funding."<sup>9</sup> The \$0 Net Funding Amount shown on Line 10 of the Funding Memo (Attachment 1) results from the negative 2020 ASC 715-60 Expenses for both the Represented and the Management groups (Line 1).

Since SCE's proposed Authorized PBOPs Expense Amount is lower than the current amount of \$6,329,000, it will result in a reduction to SCE's Base TRR, if approved by the Commission. SCE's Formula Rate recovers a portion of the total Authorized PBOPs Expense Amount through the Formula Base Transmission Revenue Requirement, with the remainder being recovered through SCE's California Public Utilities Commission jurisdictional rates. The Commission-jurisdictional portion is based on SCE's Formula Rate labor allocation factor, currently about 6%. Accordingly, SCE's Formula Rate Base Transmission Revenue Requirement would be reduced by about \$0.380 million (\$6,329,000 - \$0 times the labor allocation factor of about 6%).

#### **IV. EFFECTIVE DATE**

Pursuant to Section 8b of the Formula Protocols, SCE requests that the Commission authorize the revised Authorized PBOPs Expense Amount of \$0, to become effective January 1, 2021. Acceptance of the proposed amount on the requested effective date will allow SCE to incorporate the new lower value in the TO2022 Annual Update process setting the Base TRR and associated rates for the 2022 year, including the posting of the TO2022 Draft Annual Update by June 15, 2021, and the filing of the TO2022 Annual Update by December 1, 2021.

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<sup>9</sup> The "Net 2020 Funding" is the amount of that is either: (1) used to pay for retiree benefits directly, or (2) contributed to irrevocable benefit trusts relating to PBOPs.

Attached to this filing are clean and redline tariff sheets reflecting the proposed Authorized PBOPs Expense Amount, as shown on Schedule 20, Note 3, Line a of the Formula Spreadsheet. Section 8b of the Formula Protocols states that in the event that SCE makes a Section 205 filing to revise the Authorized PBOPs Expense Amount, the revisions shall become effective for the year in which the filing is being made. The specific revision to the Formula Rate Spreadsheet is to revise Schedule 20 A&G Expenses, Note 3, Line a from the current value of \$6,329,000 to the proposed value of \$0.

## **V. COMMUNICATIONS**

SCE requests that all correspondence, pleadings and other communications concerning this filing be served upon:

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## **VI. SERVICE**

Copies of this filing have been served on all parties to Docket No. ER19-1553 including the CPUC, as well as the California Independent System Operator (“CAISO”).

## **VII. OTHER FILING REQUIREMENTS**

There are no forecast changes in revenues resulting from the revisions to the Formula Rate proposed in this filing. If the Commission approves the proposed revised Authorized PBOPs Expense Amount for 2021, however, SCE's TO2022 Base TRR for 2022 will be approximately \$0.380 million lower than if the currently-effective amount were to be maintained.

No expenses or costs included in the rates tendered herein have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative or unnecessary costs that are demonstrably the product of discriminatory employment practices.

SCE believes that the information contained in this filing provides a sufficient basis upon which to accept this filing; however, to the extent necessary, SCE further requests that the Commission waive its filing requirements contained in Section 35 of its regulations to the extent necessary in order to permit this filing to be made effective as requested.

SCE believes that this filing conforms to any rule of general applicability and to any Commission order specifically applicable to SCE, and has made copies of this filing available for public inspection in SCE's principal office located in Rosemead, California. SCE has provided copies of this filing to those persons whose names appear on the enclosed mailing list.

Very truly yours,

*/s/ Jeffrey L. Nelson*

Jeffrey L. Nelson

## 2021 PBOPs FILING SERVICE LIST

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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this day, served a true copy of “**REVISION TO FORMULA RATE TARIFF AUTHORIZED 2021 POST RETIREMENT BENEFITS OTHER THAN PENSIONS (“PBOPs”) OF SOUTHERN CALIFORNIA EDISON COMPANY**” on all parties identified on the official service list(s) for FERC docket ER19-1553-000, including the CPUC, as well as the California Independent System Operator (“CAISO”). Service was effected by transmitting the copies via email to all parties who have provided an e-mail address. First class mail will be used if electric service cannot be effectuated.

Dated at Rosemead, California this **26th**, day of **March 2021**.

*/s/Vicki Carr-Donerson* \_\_\_\_\_

Vicki Carr-Donerson  
Sr Specialist, Legal Support

Southern California Edison Company  
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